

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED

Count One: 18 U.S.C. § 1349 – Conspiracy to Commit Wire Fraud

☐ Petty☐ Minor

Counts Two and Three: 18 U.S.C. § 1343 – Wire Fraud

☐ Misdemeanor☒ Felony
 PENALTY: Maximum Prison Term: 20 years
 Maximum Term of Supervised Release: 3 years
 Fine: \$250,000
 Forfeiture

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

▶ Antoine Tsao, a/k/a Chung Tien Tsao,

DISTRICT COURT NUMBER

CR25-00082 AMO

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Federal Bureau of Investigation

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

 Name and Office of Person
 Furnishing Information on this form Patrick D. Robbins

☒ U.S. Attorney ☐ Other U.S. Agency

 Name of Assistant U.S.
 Attorney (if assigned) Benjamin K. Kleinman
DEFENDANT**IS NOT IN CUSTODY**

- 1)
- ☒
- Has not been arrested, pending outcome this proceeding.
-
- If not detained give date any prior summons was served on above charges ▶

2) ☐3) ☐4) ☐5) ☐6) ☐**FILED**

Mar 25 2025

IS

 Mark B. Busby
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO

If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes
 been filed? ☐ No

 If "Yes"
 give date
 filed

**DATE OF
 ARREST** ▶

Month/Day/Year

Or... if Arresting Agency & Warrant were not

**DATE TRANSFERRED
 TO U.S. CUSTODY** ▶

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT
Bail Amount: No bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

 * Where defendant previously apprehended on complaint, no new summons or
 warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

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Name of District Court, and/or Judge/Magistrate Location

 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION
DEFENDANT - U.S.
 Ian Sofronov

DISTRICT COURT NUMBER

CR25-00082 AMO

PROCEEDING

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Federal Bureau of Investigation

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 CASE NO.

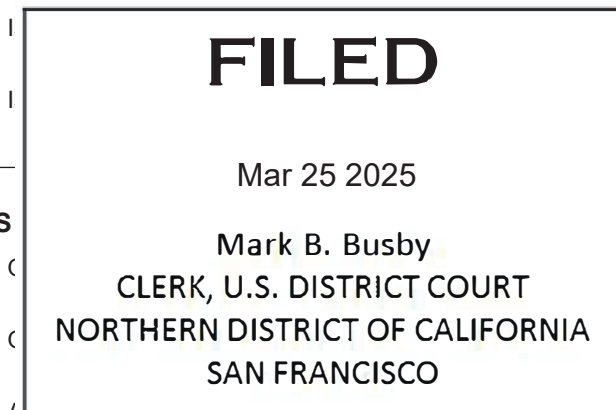
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2) ☐ I3) ☐ I4) ☐ C5) ☐ C6) ☐ A7) ☐ A8) ☐ A

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 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED

Count One: 18 U.S.C. § 1349 – Conspiracy to Commit Wire Fraud

☐ Petty☐ Minor

Counts Two and Three: 18 U.S.C. § 1343 – Wire Fraud

☐ Misdemeanor☒ Felony
 PENALTY: Maximum Prison Term: 20 years
 Maximum Term of Supervised Release: 3 years
 Fine: \$250,000
 Forfeiture

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**DEFENDANT - U.S.**

Nemanja Popov

DISTRICT COURT NUMBER

CR25-00082 AMO

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Federal Bureau of Investigation

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21, or 40. Show District

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SHOW
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MAGISTRATE
CASE NO.
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 Name and Office of Person
 Furnishing Information on this form Patrick D. Robbins

☒ U.S. Attorney ☐ Other U.S. Agency

 Name of Assistant U.S.
 Attorney (if assigned) Benjamin K. Kleinman
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2) ☐ Is3) ☐ Is**IS IT**4) ☐ Or5) ☐ Or6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes
 been filed? ☐ No

 If "Yes"
 give date
 filed
**DATE OF
ARREST**

Month/Day/Year

Or... if Arresting Agency & Warrant were not

**DATE TRANSFERRED
TO U.S. CUSTODY**

Month/Day/Year

FILED

Mar 25 2025

 Mark B. Busby
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO

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Defendant Address:

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Date/Time: Before Judge:

Comments:

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: OAKLAND

CR25-00082 AMO

UNITED STATES OF AMERICA,

V.

ANTOINE TSAO, a/k/a Chung Tien Tsao,
IAN SOFRONOV, and
NEMANJA POPOV,

DEFENDANT(S).

FILED

Mar 25 2025

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

INDICTMENT

18 U.S.C. § 1349 – Conspiracy to Commit Wire Fraud;
18 U.S.C. § 1343 – Wire Fraud;
18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Forfeiture Allegations

A true bill.

/s/ Foreperson of the Grand Jury

Foreman

Filed in open court this 25th day of

March, 2025.


Sallie Kim, U.S. Magistrate Judge


Brenda Lopez, Deputy Clerk

Bail, \$ Warrants (3)

Hon. Sallie Kim, U.S. Magistrate Judge

FILED

Mar 25 2025

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

PATRICK D. ROBBINS (CABN 152288)
Acting United States Attorney

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANTOINE TSAO, a/k/a Chung Tien Tsao,
IAN SOFRONOV, and
NEMANJA POPOV,

Defendants.

) CASE NO.CR25-00082 AMO

) VIOLATIONS:

) 18 U.S.C. § 1349 – Conspiracy to Commit Wire
Fraud;

) 18 U.S.C. § 1343 – Wire Fraud;

) 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) –
Forfeiture Allegations

) OAKLAND VENUE

) **UNDER SEAL**

INDICTMENT

The Grand Jury charges:

Introductory Allegations

At all times relevant to this Indictment:

1. GOTBIT CONSULTING LLC (“GOTBIT”), also known as GotBit Hedge Fund, was a company registered in Belize. GOTBIT operated both inside and outside the United States. GOTBIT had a public website (“https://gotbit.io/”) on which it purported to offer “market making” services for cryptocurrencies, such as active monitoring of cryptocurrency trading and price fluctuations, trading in cryptocurrencies to capitalize on price fluctuations, and related consulting services. GOTBIT received

1 customer payments using its cryptocurrency wallets, including the wallet address ending in P1Awf (the
2 “GOTBIT Wallet”).

3 2. Defendant Antoine TSAO, a/k/a Chung Tien Tsao (“TSAO”), lived in Taiwan and
4 worked as a Business Development Manager at GOTBIT.

5 3. Defendant Ian SOFRONOV (“SOFRONOV”) lived in Russia and worked as a Sales
6 Manager at GOTBIT.

7 4. Defendant Nemanja POPOV (“POPOV”) lived in Serbia and worked as a Global
8 Account Manager at GOTBIT.

9 5. Co-conspirator 1 (“CC-1”) lived in Russia and Portugal and was the founder and Chief
10 Executive Officer at GOTBIT.

11 6. Co-conspirator 2 (“CC-2”), co-conspirator 3 (“CC-3”), and co-conspirator 4 (“CC-4”) were individuals who worked at GOTBIT.

13 7. The Lexobit Token (“Lexobit”) was a cryptocurrency token created at the direction of
14 law enforcement. Lexobit operated on the Ethereum blockchain.

15 8. Beginning at a date unknown to the Grand Jury but no later than in or around January
16 2018 and continuing through a date unknown to the Grand Jury, but to at least on or about August 20,
17 2024, defendants TSAO, SOFRONOV, POPOV, CC-1, CC-2, and CC-3, and others known and
18 unknown to the Grand Jury, conspired to manipulate the trading volume and price of one or more
19 cryptocurrencies, including Lexobit, in order to profit through payments from cryptocurrency companies
20 and from the sale of those cryptocurrencies at inflated prices.

21 Key Terms

22 9. Virtual currency was a digital asset or digital representation of value that can be
23 electronically traded and exchanged online. Virtual currency was not backed or insured by a central
24 bank and its value may or may not be tied to or secured by a fixed asset. Similar to many fiat currencies,
25 many virtual currencies have had a market-based value that goes up or down based on various factors.

26 10. Cryptocurrency was a subset of virtual currency that utilizes blockchain technology. A
27 blockchain was a distributed ledger, recorded on a decentralized network, containing an immutable and
28 historical record of transactions made with the cryptocurrency. Each cryptocurrency had its own coding

1 (or “smart contract”) that governs how it operated.

2 11. Ethereum was a well-known blockchain that could be used to create different
3 cryptocurrencies. Ether (“ETH”) was the primary Ethereum-based cryptocurrency. Many other
4 Ethereum-based cryptocurrencies utilized the Ethereum blockchain, which were referred to in the
5 cryptocurrency community as “tokens.”

6 12. Cryptocurrency could be stored in a cryptocurrency “wallet” located, for example, in an
7 electronic storage device, in a cloud-based server, or on a cryptocurrency exchange. Cryptocurrency
8 transactions could be made between wallets.

9 13. Cryptocurrency “exchanges” were digital marketplaces where individuals could purchase
10 or trade cryptocurrencies. Depending on the exchange’s level of control over its listings and trading,
11 exchanges were typically referred to either as “decentralized” (commonly abbreviated as “DEX”) or
12 “centralized” (commonly abbreviated as “CEX”). During the relevant period, Uniswap operated as a
13 decentralized cryptocurrency exchange that was available to the public, including to individuals in the
14 United States.

15 14. A “market maker” in the cryptocurrency industry was a company that offered services to
16 cryptocurrency companies. Legitimate market-making services included, for example, the active
17 monitoring of cryptocurrency trading and price fluctuations, trading in a company’s cryptocurrency to
18 capitalize on price fluctuations, and related consulting services.

19 15. “Wash trading” occurred when a single trader or a number of traders, working in
20 coordination, acted as both the buyer and the seller in the same transaction or a series of transactions,
21 such that there was no change in beneficial ownership. These transactions served no legitimate
22 economic purpose and were designed solely to generate misleading market information and created the
23 false impression of market interest to induce other investors to buy or sell the asset.

24 The Conspiracy and Scheme to Defraud

25 As part of the conspiracy and scheme to defraud:

26 16. In or around 2018, CC-1 founded GOTBIT, a cryptocurrency market
27 maker. In or around April 2021, GOTBIT’s registration documents listed CC-1 as its sole owner.
28 According to GOTBIT’s website, by 2021, GOTBIT had more than “100 team members.”

17. In reality, GOTBIT and its employees perpetrated a widespread cryptocurrency market manipulation scheme wherein cryptocurrency companies (“GOTBIT Customers”) paid GOTBIT approximately \$5,000 per month to artificially inflate the trading volume of the GOTBIT Customers’ tokens through wash trading. This trading tactic created the appearance that the GOTBIT Customers’ cryptocurrencies had more active, organic trading markets than really existed, thereby inducing investors to purchase those cryptocurrencies and increasing the trading price of those cryptocurrencies. GOTBIT and the GOTBIT Customers then profited through the sale of those cryptocurrencies at the artificially inflated trading prices that they themselves created. CC-1 outlined GOTBIT’s role in fraudulent schemes during media interviews in 2019, stating:

- a. “Our product now is providing the full control over the token’s market: the volume, the price, the liquidity, and making money on the price movements[.]”
- b. “We would create a buy order from one account, a sell order from another account, they would meet inside of the spread where there were no other orders . . . [.]”
- c. CC-1 was also asked whether cryptocurrency exchanges can trace whether GOTBIT’s accounts were “trading with themselves?” CC-1 replied, “[W]e have a solution for this. The current version of our software supports up to 20 accounts for the cross-platform trading. Let’s say there are 20 accounts on an exchange all connected to our bot; we’ll have to do a bit of magic with IP addresses but . . . everything will look as if those 20 accounts are trading between each other and it’s very hard to track what is going on in reality.”
- d. CC-1 also stated, “I think that it’s the investors and those who believe in the crypto industry who are losing here.”

Wash Trading of the Lexobit Token

18. On or about February 28, 2024, law enforcement Undercover Employees (the “UCes”) approached TSAO at a cryptocurrency conference. During their initial encounter, the UCes expressed interest to TSAO in retaining GOTBIT’s market-making services for Lexobit.

19. On or about February 29, 2024, the UCes met with TSAO to further discuss GOTBIT’s

1 services. During the meeting, TSAO explained how GOTBIT could provide services for the UCEs’
2 token project, stating, in pertinent part:

- 3 a. “So, I think the main difference between crypto and other industries is crypto is a lot less
4 regulated. The stuff that we do can’t really be done in traditional markets”
- 5 b. “We also do a lot of liquidations for projects. There are like meme projects that just
6 pump their price up and then they just start dumping the shit out of it. Just dump
7 everything and just move on to the next one. We take like 2% from liquidations. So, we
8 are also very transparent about it. We don’t judge.”
- 9 c. “It all depends on what you guys want. For, like, in depth conversations, we can just
10 bring the whole team in and see how we can structure up the strategy. If it’s a pump and
11 dump, then [let the team know] how we’re supposed to do it.”

12 20. On or about April 10, 2024, after the UCEs had expressed interest in moving forward
13 with a business arrangement with GOTBIT, TSAO created a private chatroom on Telegram, an
14 encrypted cloud-based messaging service. TSAO invited the UCEs and two GOTBIT employees, one of
15 whom was SOFRONOV, into the chatroom and named it “Lexobit <> GotBit” (the “Telegram chat”).
16 TSAO and SOFRONOV then scheduled a video conference with the UCEs.

17 21. On or about May 9, 2024, the UCEs had a video conference with TSAO and
18 SOFRONOV in which they discussed the terms and conditions of a formal business arrangement
19 between GOTBIT and the UCEs’ token project. During the call, SOFRONOV explained that at
20 GOTBIT “we have discussions [with you] everyday - about . . . what volumes we should apply . . . like a
21 personal trading team.” TSAO added, “You know what you want to see in the charts. . . . You tell us
22 what to do and we execute it.”

23 22. After the video conference, SOFRONOV sent a document to the Telegram chat entitled,
24 “Proposal for Lexobit.pptx.pdf.” The document stated, among other things, that, “Lexobit is looking for
25 the proper Marketmaking, creating a decent market, attract traders to the market and future market
26 involvement [*sic*]. Gotbit is ready to help with this and show better performance on the markets. With
27 you will work a team of 6 professional traders, who will control your market all day long” The
28

1 proposal stated that GOTBIT does “High-frequency trading” and has a “Dynamic volume system”
2 where it does “volume management during the day.”

3 23. On or about May 21, 2024, the UCEs informed SOFRONOV and TSAO that they were
4 prepared to agree to GOTBIT’s proposal and inquired about next steps.

5 24. On or about May 22, 2024, SOFRONOV responded to the UCEs via the
6 Telegram chat. SOFRONOV replied, in pertinent part, “I prepare the legal contract and send it to you.
7 Firstly, we signed a legal document. There you will find all the terms and conditions[.]” SOFRONOV
8 further stated that he would “allocate a team” for Lexobit and they need to “finalize the MM [Market
9 Making] inventory process (like funds that we trade with) and start working!”

10 25. On or about May 22, 2024, a UCE executed a “Market Maker Agreement” with GOTBIT
11 pursuant to which GOTBIT agreed to provide market-making services in support of the UCEs’ token
12 project. Section 1.2 of the Market Maker Agreement listed the services provided by GOTBIT, which
13 included a “trading volume system.” Section 3.1.2 of the Market Maker Agreement stated that GOTBIT
14 was entitled to “2% of the token liquidation generated” by GOTBIT. Section 3.1.3 of the Market Maker
15 Agreement stated that GOTBIT was entitled to “20% of the net profit generated” by GOTBIT.

16 26. On or about May 22, 2024, the Market Maker Agreement was digitally signed by
17 CC-1.

18 27. On or about May 22, 2024, SOFRONOV sent an invoice to the UCEs via a link he posted
19 within the Telegram chat. Shortly thereafter, to consummate the market-making agreement with
20 GOTBIT, and to retain its services for a three-month period, one of the UCEs made a payment of
21 \$15,000 to the GOTBIT wallet. SOFRONOV sent a message to the Telegram chat confirming
22 GOTBIT’s receipt of the payment.

23 28. On or about May 22, 2024, CC-4 added several additional GOTBIT employees
24 to the Telegram chat, including POPOV, CC-2, and CC-3. CC-4 introduced POPOV as a “personal
25 account manager,” and CC-2 and CC-3 were described as personal traders.

26 29. On or about June 10, 2024, the UCEs conducted a virtual teleconference via Google Meet
27 with POPOV and CC-3. During the meeting, POPOV stated, in pertinent part:
28

- 1 a. “Regarding those things that you might need, for example, ‘I would like to see volume
2 push in the next nine hours.’ Completely fine. You can just type it in the chat. Tag me
3 or anybody from the trading team and we are going to be ready to execute as you wish on
4 the markets with the bots.”
- 5 b. “Regarding the percentages, we can always tell you, regarding when the spike happens,
6 which part was organic, which part wasn’t”
- 7 c. “We are going to have the order book, which you can always look on to see which sell
8 and which buy is open, and you’re going to know and differentiate which one is ours and
9 which one is not.”

10 30. On or about August 9, 2024, CC-3 sent a message to the Telegram chat,
11 stating, “To start the work, [and] possible push and work on volumes, we will need 5 ETH + 4% of the
12 supply token. An important point that I would like to note is that we will be able to deploy the bot only
13 if we have funds. And after the deployment, we will send a list of all wallets to the chat.”

14 31. On or about August 14, 2024, in response to CC-3’s request, one of the UCEs sent 5 ETH
15 (valued at approximately \$17,605 at the time of the transaction) to the GOTBIT Wallet.

16 32. On or about August 19, 2024, CC-2 sent one of the UCEs a list of 36 cryptocurrency
17 wallet addresses (collectively, the “GOTBIT Trading Wallets”) that GOTBIT would use to trade Lexobit
18 and informed the UCEs that the “bots are deployed and ready for launch.”

19 33. On or about August 19, 2024, traders from GOTBIT engaged in wash trading of Lexobit
20 on the Uniswap cryptocurrency exchange until later that day when law enforcement suspended trading
21 activity.

22 34. On or about August 20, 2024, one of the UCEs conducted a video call with POPOV in
23 which POPOV said to the UCE that “100%” of the trading volumes for Lexobit were “inorganic” and
24 driven by GOTBIT surreptitiously trading with its own cryptocurrency wallets.

25 35. Law enforcement analysis of the blockchain data associated with the trading of Lexobit
26 corroborated POPOV’s statement and revealed that substantially all of the activity generated during the
27 launch of Lexobit was the result of GOTBIT’s wash trading activities. Specifically, the analysis
28

revealed that there was a total of 1,221 buy and sell transactions of Lexobit. Of this total, GOTBIT Trading Wallets conducted 1,209 (or 99%) of the buy and sell transactions.

36. TSAO, SOFRONOV, POPOV, CC-1, CC-2, and CC-3 used means and instrumentalities of interstate commerce in connection with the above actions in the scheme to defraud, including email and messaging communications, electronic funds transfers, and cryptocurrency transfers.

COUNT ONE: (18 U.S.C. § 1349 – Conspiracy to Commit Wire Fraud)

37. Paragraphs 1 through 36 of this Indictment are re-alleged and incorporated as if fully set forth here.

38. Beginning at a date unknown to the Grand Jury but no later than in or around January 2018, and continuing through a date unknown to the Grand Jury, but to at least on or about August 20, 2024, both dates being approximate and inclusive, in the Northern District of California and elsewhere, the defendants,

ANTOINE TSAO,
IAN SOFRONOV, and
NEMANJA POPOV,

and others, known and unknown, did knowingly conspire to devise and intend to devise a scheme and artifice to defraud as to a material matter, and to obtain money and property by means of materially false and fraudulent pretenses, representations, promises, and concealment of material facts, and, for the purpose of executing such scheme or artifice and attempting to do so, transmit, and caused to be transmitted, by means of wire communication in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Section 1349.

COUNTS TWO AND THREE: (18 U.S.C. § 1343 – Wire Fraud)

39. Paragraphs 1 through 36 of this Indictment are re-alleged and incorporated as if fully set forth here.

40. Beginning at a date unknown to the Grand Jury but no later than in or around January 2018, and continuing through a date unknown to the Grand Jury, but to at least on or about August 20,

2024, both dates being approximate and inclusive, in the Northern District of California and elsewhere,
the defendants,

ANTOINE TSAO,
IAN SOFRONOV, and
NEMANJA POPOV,

together with others known and unknown, did knowingly and with the intent to defraud participate in,
devise, and intend to devise a scheme and artifice to defraud as to a material matter, and to obtain money
and property by means of materially false and fraudulent pretenses, representations, and promises, and
by means of concealment of material facts.

The Use of the Wires

41. On or about the dates set forth in the separate counts below, in the Northern District of
California and elsewhere, for the purpose of executing the aforementioned scheme and artifice to
defraud and attempting to do so, the defendants,

ANTOINE TSAO,
IAN SOFRONOV, and
NEMANJA POPOV,

did transmit and cause to be transmitted in interstate and foreign commerce, by means of a wire
communication, certain writings, signs, signals, pictures, and sounds, specifically:

COUNT	DATE	DESCRIPTION OF WIRE COMMUNICATION
TWO	May 9, 2024	Videoconference between TSAO and SOFRONOV, two GOTBIT employees located outside the Northern District of California, and two UCEs, both of whom were located within the Northern District of California, to discuss artificially inflating the trading volume of the Lexobit Token through manipulative trading.
THREE	June 10, 2024	Videoconference between POPOV, a GOTBIT employee located outside the Northern District of California, and two UCEs, one of whom was located within the Northern District of California, to discuss artificially inflating the trading volume of the Lexobit Token through manipulative trading.

All in violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATION: (18 U.S.C. § 981(a)(1) and 28 U.S.C. § 2461(c))

42. The allegations contained in this Indictment are re-alleged and incorporated by reference

1 for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1) and
2 Title 28, United States Code, Section 2461(c).

3 43. Upon conviction for any of the offenses set forth in Count One through Count Three of
4 this Indictment, the defendants,

5 ANTOINE TSAO,
6 IAN SOFRONOV, and
7 NEMANJA POPOV,

8 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and
9 Title 28, United States Code, Section 2461(c), all property, real or personal, constituting, or derived
10 from proceeds the defendant obtained directly and indirectly, as the result of those violations, as the
11 result of those violations, including but not limited to:

- 12 a. the wallet address ending in P1Awf (the “GOTBIT Wallet”) used by GOTBIT
13 employees to receive payment for market manipulation services.

14 If any of the property described above, as a result of any act or omission of the defendants:

- 15 a. cannot be located upon exercise of due diligence;
16 b. has been transferred or sold to, or deposited with, a third party;
17 c. has been placed beyond the jurisdiction of the court;
18 d. has been substantially diminished in value; or
19 e. has been commingled with other property which cannot be divided without
20 difficulty,

21 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,
22 United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1)
23 and Title 28, United States Code, Section 2461(c).

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25 //

26 //

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1 All pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code,
2 Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

3
4 DATED: March 25, 2025

A TRUE BILL.

5
6 /s/ Foreperson of the grand jury
7 FOREPERSON

8 PATRICK D. ROBBINS
9 Acting United States Attorney

10 /s/ Benjamin Kleinman
11 BENJAMIN K. KLEINMAN
12 Assistant United States Attorney